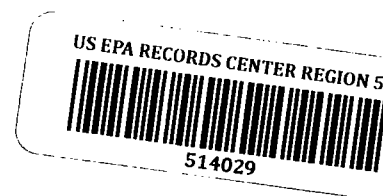




**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**



March 15, 1995

Regional Administrator  
United States Environmental  
Protection Agency, Region 5  
ATTN: Darryl Owens  
Mail Code 5HS-11  
230 South Dearborn Street  
Chicago, Illinois 60604

Director, Solid and Hazardous  
Waste Division  
Minnesota Pollution Control Agency  
ATTN: Site Response Section  
520 Lafayette Road North  
St. Paul, Minnesota 55155

President  
Reilly Industries, Inc.  
1510 Market Square Center  
151 North Delaware  
Indianapolis, Indiana 46204

RE: United States of America, et al. vs. Reilly Tar &  
Chemical Corporation, et al.  
File No. Civ. 4-80-469

Gentlemen:

Enclosed is the 1994 annual progress report submitted pursuant to Part K of the Consent Decree in the above captioned matter. This report is issued by the City in accordance with Section 2(a) of the Reilly/St. Louis Park Agreement (Exhibit B to the Consent Decree).

Sincerely,

A handwritten signature in cursive script, appearing to read "Scott E. Anderson".

Scott E. Anderson  
Superintendent of Utilities

SEA/cmr  
enclosure

cc: William Gregg (w/2 enclosures)  
Elizabeth Thompson (w/o enclosure)  
Reilly File

K04  
3/15/95

**1994 ANNUAL PROGRESS REPORT  
ON THE  
IMPLEMENTATION OF THE CONSENT DECREE**

**SUBMITTED TO THE**

**REGIONAL ADMINISTRATOR  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V**

**EXECUTIVE DIRECTOR  
MINNESOTA POLLUTION CONTROL AGENCY**

**BY**

**THE CITY OF ST. LOUIS PARK, MINNESOTA**

**PURSUANT TO  
CONSENT DECREE - PART K**

**UNITED STATES OF AMERICA, ET AL.**

**VS.**

**REILLY TAR & CHEMICAL CORPORATION, ET AL.**

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
CIVIL NO. 4-80-469**

**MARCH 15, 1995**

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## **1.0 INTRODUCTION**

The Consent Decree in United States of America, et al. vs. Reilly Tar & Chemical Corporation, et al. (U.S. District Court, Minnesota, Civil No. 4-80-469) was signed by Judge Magnuson on September 3, 1986, and entered by the Court on the following day. The Effective Date of the Consent Decree is therefore September 4, 1986 (see Part EE of the Consent Decree).

The Consent Decree requires various actions to be taken by Reilly Industries, Inc. (Reilly), the City of St. Louis Park (City), the United States Environmental Protection Agency (USEPA), the Minnesota Pollution Control Agency (MPCA), and/or the Minnesota Department of Health (MDH). These actions are required by the Consent Decree itself, by the Remedial Action Plan (RAP) (Exhibit A to, and an integral and enforceable part of the Consent Decree, per Part F thereof), or by an Agreement between Reilly and the City (Reilly/City Agreement) (Exhibit B to, and an integral and enforceable part of the Consent Decree, per Part Q thereof, as to the rights and responsibilities between Reilly and the City).

This annual progress report (Report) submitted in accordance with the requirements of Part K of the Consent Decree describes actions taken to implement the requirements of the Consent Decree from January 1 through December 31, 1994. This report also describes activities scheduled for calendar year 1995 as required by Part K.

As an aid to the reader in following the progress of the many activities involved, this Report provides separate descriptions of completed and scheduled activities required by the Consent Decree (Sections 2 and 3, respectively) and by the RAP (Sections 4 and 5, respectively). Within each section, areas of activity are discussed in the order in which they are discussed in the Consent Decree and RAP.

## **2.0 COMPLETED CONSENT DECREE ACTIVITIES**

Part K of the Consent Decree requires that Reilly submit annual progress reports to the USEPA and MPCA by March 15, which describe actions taken to implement the requirements of the Consent Decree during the previous year and describe activities scheduled for the year in which the report is released. The 1993 Annual Report was submitted by the City, on behalf of Reilly, on March 15, 1994 pursuant to the requirements of Part D, Paragraph 8 of the Consent Decree.

Part O of the Consent Decree states that Reilly, the City, the USEPA, or the MPCA may change its designated Project Leader and alternate by notifying the other Parties, in writing, of the change. In correspondence dated October 12, 1994, the City informed Reilly and the Agencies that the City had designated William Gregg as its Project Leader and Scott Anderson as its Alternate Project Leader.

Part Y of the Consent Decree requires Reilly to provide the USEPA and MPCA with current certification of insurance for certain specified coverages. Reilly wrote the USEPA and MPCA on July 7, 1987 to request that the excuse granted to Reilly on October 7, 1986 from meeting certain notification requirements for insurance cancellation be extended to July 1, 1988. The USEPA and MPCA approved this request on September 9, 1987. On March 28, 1991, Reilly submitted certificates of insurance for liability coverage, indicating excess coverage was in place. Reilly submitted information in partial compliance with Part Y and informed the Agencies that reasons necessitating an excuse continued to be valid, thereby causing it to request further extension of the excuse (relating to the language of the insurance certificates). As of December 31, 1994, no response had been received from the Agencies.

Part Z of the Consent Decree requires Reilly to deliver to the United States and State of Minnesota by May 31 of each year, a certificate prepared by Reilly's certified public accounting firm which sets forth whether Reilly's consolidated performance is in accord with the requirements established in the Consent Decree. On March 31, 1994, Reilly submitted a certificate prepared by Reilly's certified public accounting firm which sets forth whether Reilly's consolidated performance is in accord with the requirements established in the Consent Decree. Included therewith was a copy of Reilly's Resource Conservation and Recovery Act (RCRA) Financial Responsibility Assurance filing which the USEPA Region 5's RCRA office required under 40 CFR Section 264.143(f)(3). As of December 31, 1994, no response had been received from the Agencies.

### **3.0 SCHEDULED CONSENT DECREE ACTIVITIES**

Part P of the Consent Decree addresses the issue of securing access agreements to conduct the various activities contemplated in the RAP. The City has commenced negotiations with various parties from whom access authorization must be attained based upon the content of Agency correspondence dated May 3, 1989. Said correspondence approved a revision in access agreement language for certain properties owned by the Minneapolis Parks and Recreation Board; however, the Agencies indicated they would review each agreement on a case by case basis. Accordingly, individual negotiations will be initiated with each affected property owner whereon the City must perform Consent Decree related activities in 1995 in an effort to secure similar agreements to those which were approved by the Agencies on May 3, 1989.

Part Q of the Consent Decree acknowledges the Reilly/City Agreement as Exhibit B to, and an enforceable part of the Consent Decree. Section 2 of the Reilly/City Agreement provides that by September 3, 1990, if necessary to avoid sanitary sewer charges on the discharge from wells W23, the Drift-Platteville Aquifer source control wells and gradient control well, Reilly shall plan, obtain necessary permits for, and construct a treatment facility and piping to allow effluent from the wells to be discharged to a storm sewer. As noted in Section 2 of the 1991 Report, a treatment facility was made operational in 1991, treating water discharged from wells W23, and the Drift-Platteville Aquifer source control wells. To date no decision has been made on the disposition of the Drift-Platteville gradient control wells discharge.

Section 9 of the Reilly/City Agreement provides for the payment by one party of costs incurred by the other party or the sharing by the parties thereto of costs incurred by one party in the implementation of the RAP. Within 30 days of the close of the calendar quarter in which the costs were incurred, the party incurring the costs shall issue a detailed statement of costs, including supporting documentation, and within 30 days of receipt of such notice, the owing party shall pay to the other its share of the costs. It is anticipated the parties will respond to said submittals in accordance with the provisions stated herein.

Part T of the Consent Decree addresses compliance with all applicable local, state, and federal laws and regulations when implementing the Consent Decree. Among its provisions is the requirement that the USEPA and MPCA approve any facility used for off-site disposal of hazardous substances generated during work undertaken pursuant to the Consent Decree. If either Reilly or the City propose to use a facility in 1995, the Agencies must confirm the status of the facility before the shipment of hazardous wastes commences.

Part Y of the Consent Decree requires Reilly to provide the USEPA and MPCA with current certification of insurance for certain specified coverages. Appropriate documentation is due in 1995.

Part Z of the Consent Decree requires Reilly to deliver to the United States and State of Minnesota by May 31, 1995, a certificate prepared by Reilly's certified public accounting firm which sets forth whether Reilly's consolidated performance is in accord with the requirements set forth in the Consent Decree.



#### **4.0 COMPLETED REMEDIAL ACTION PLAN ACTIVITIES**

Progress continued in the implementation of the RAP during 1994. Operation of source/gradient control wells occurred throughout the year, impacting flows in the Prairie du Chien-Jordan Aquifer (SLP4), St. Peter Aquifer (W410) and the Drift-Platteville Aquifer (W420, W421, W422). In addition, monitoring of the Mount Simon-Hinckley, Iron-ton-Galesville, Prairie du Chien-Jordan, St. Peter, and Drift-Platteville Aquifers was undertaken. Table 1 summarizes the progress made in completing the many activities contemplated in the RAP. Further details on the various RAP activities are provided below.

Section 3.3. of the RAP requires Reilly to submit annual Sampling Plans to the USEPA and MPCA. Section 2(a) of the Reilly/City Agreement provides that the City assume all of Reilly's obligations under Section 3 of the RAP. The City submitted its proposed 1994 Sampling Plan on November 1, 1993 in accordance with the requirements of RAP Section 3.3. On December 23, 1993 the City received correspondence from the Agencies commenting on the 1994 Sampling Plan. On January 12, 1994 the City submitted proposed 1994 Sampling Plan revisions to the Parties. In correspondence dated May 9, 1994, the Agencies approved the 1994 Sampling Plan.

The City submitted its proposed 1995 Sampling Plan on October 12, 1994. As of the date of this Report no response has been provided by the Agencies relative to the City's October 12, 1994 submittal.

Section 3.4. of the RAP requires Reilly to submit an Annual Report to the USEPA and MPCA containing the results of all monitoring during the previous calendar year. The City submitted the 1993 Annual Report on behalf of Reilly on March 15, 1994.

Insofar as the City is responsible for submitting a report for 1994 activities, the USEPA, MPCA, and Reilly will receive the document under separate cover.

The City operated the GAC treatment system in substantial compliance with Section 4.2. of the RAP during 1994, treating 475.9 million gallons of water. In correspondence dated November 15, 1994, the City notified the USEPA, MPCA, and Reilly that the results of third quarter 1994 monitoring indicated that the total Other polynuclear aromatic hydrocarbons (PAH) appeared to exceed the Drinking Water Criterion of Other PAH established in Section 2.2 of the RAP, and indicated the GAC treatment system had been removed from service pending GAC replacement.

The GAC treatment system operated in a full time mode from the beginning of the year until June. The GAC treatment system was off line for nine (9) days (June 17 to 25) due to the replacement of the sand filter water treatment plant control system. The GAC treatment system returned to a full time operational mode until November. The GAC treatment system returned to a full time mode after the change out. In correspondence dated November 15, 1994, the City notified the USEPA, MPCA, and Reilly that the results of the third quarter 1994 monitoring indicated that the total of Other PAH exceeded the Drinking Water Criteria of Other PAH established in Section 2.2 of the RAP, and indicated the GAC treatment system had been immediately removed from service as of October 15, 1994 pending GAC replacement. The GAC system was operated in October and November to comply with the pumping requirement established in Section 4.2.1 of the RAP. The volume pumped during the month of November was discharged to the surface water system. The GAC was replaced the week of December 5, 1994 and the system was returned to service on December 12, 1994.

Insofar as Section 4.3.5. of the RAP requires that an annual report of the results of all GAC system monitoring completed in 1994 be reported by March 15, 1995, the City will forward a copy of said report to the USEPA, MPCA, MDH, and Reilly under separate cover by the required date.

Section 5.1. of the RAP requires Reilly to monitor the City's Mount Simon-Hinckley Aquifer wells on an annual basis. Section 2(a) of the Reilly/City Agreement provides that the City complete this task on behalf of Reilly. The City completed the Mount Simon-Hinckley Aquifer monitoring in compliance with Section 5.1. of the RAP, and the results have been presented in an annual report issued in accordance with Section 3.4. of the RAP.

Section 6.1.3. of the RAP requires Reilly to pump W105 at a monthly average rate of 25 gallons per minute (gpm) until such time as the well's discharge is in compliance with cessation criteria contained in Section 6.1.5. On December 4, 1991 the Agencies authorized the City to discontinue the pumping of well W105, and on December 13, 1991 the well was shut down.

Section 6.1.5. of the RAP requires Reilly to monitor W105 on an every other year basis. Section 2(a) of the Reilly/Tar Agreement provides that the City complete this task on behalf of Reilly. The City completed the monitoring in accordance with Section 6.1.5. of the RAP in 1994.

Section 7.1.3. of the RAP requires Reilly to pump W23 at a monthly average rate of 50 gpm. Section 2(a) of the Reilly/City Agreement provides that the City operate W23 beginning the day pumping is started. In correspondence dated December 20, 1994 the City advised the Parties that it had experienced a break in the forcemain serving W23. The break appears to be directly beneath the building and is not related to the discharge piping which was previously replaced. Repair is planned for Spring of 1995.

A summary of the 1994 monthly pumpage is presented on Table 2.

Section 7.2.7. of the RAP requires Reilly to pump SLP4 at a monthly average rate of approximately 900 gpm from October through April and 300 gpm from May through September. Section 2(a) of the Reilly/City Agreement provides that the City assume this obligation for Reilly. Pumping was suspended in October through December due to process equipment breakdown. A summary of the 1994 monthly pumpage is presented on Table 3.

Section 7.3. of the RAP requires Reilly to monitor the Prairie du Chien-Jordan Aquifer as specified in Section 3. of the RAP. Section 2(a) of the Reilly/City Agreement provides that the City will assume this obligation for Reilly. Monitoring of the aquifer was completed by the City in substantial compliance with Sections 3. and 7.3. of the RAP, and information relative to the monitoring can be found in the annual report submitted pursuant to Section 3.4. of the RAP.

Section 7.4.2. of the RAP authorizes the Agencies to assess the effect of the diminution of the pump stress placed on the Prairie du Chien-Jordan Aquifer if the pumping rate of W48 is changed. In correspondence dated September 3, 1993 the Agencies acknowledged W48 was not being pumped and requested that documentation be provided which indicated that efforts had been taken to ensure that W48 would remain in operation. On September 21, 1993 the City advised the Parties of action taken relative to the operation of W48 and indicated that a groundwater flow model would be developed to simulate the pumping of the other wells in the aquifer gradient control network. On April 18, 1994 the City submitted the results of the groundwater flow model, and indicated its preference to use well SLP4 as the primary pumping well for achieving gradient control. As of the date of this report, the City has not received any comments regarding the April 18, 1994 submittal.

Section 8.3. of the RAP authorizes the USEPA and MPCA to require Reilly to install and operate a gradient control well system for the purpose of preventing the further spread of groundwater exceeding any of the Drinking Water Criteria defined in RAP Section 2.2. in the St. Peter Aquifer. Section 2(a) of the Reilly/City Agreement provides that the City complete this task on behalf of Reilly.

In response to April 1, 1991 correspondence from the Agencies on the issue, the City placed W410 in service on May 30, 1991. A summary of the 1994 pumpages is presented in Table 4.

A review of the summary indicates W410 was pumped within the parameters proposed by the City (65-100 gpm).

Monitoring of St. Peter Aquifer monitor wells occurred in accordance with the provisions of the 1994 Sampling Plan. A report of the results and the effectiveness of well W410 as a gradient control well can be found in an annual report issued pursuant to Section 3.4. of the RAP.

Section 9.1.3. of the RAP requires Reilly to operate the Drift-Platteville Aquifer source control wells at a monthly rate of 25 gpm and monitor them on a quarterly basis. Section 2(a) of the Reilly/City Agreement provides that the City operate the wells beginning the day pumping is started and monitor them as required. Accordingly, the City has operated the wells and has performed necessary periodic inspections as outlined in a plan approved under Section 9.1.1. of the RAP.

Since 1989 the pumping rates of wells (W420, W421) was increased to the maximum extend practicable to achieve the greatest degree of source control. A summary of the 1994 monthly pumpages for wells W420, W421 are presented in Tables 5 and 6 respectively.

Monitoring of the Drift-Platteville Aquifer source control wells occurred on a quarterly basis pursuant to the requirements of Sections 3.2. and 9.1.3. of the RAP. A report of the results can be found in an annual report issued pursuant to Section 3.4. of the RAP.

Section 9.2.3. of the RAP requires Reilly to operate the Drift Aquifer gradient control well at a monthly rate of 50 gpm and monitor it on a quarterly basis. Section 2(a) of the Reilly/City Agreement provides that the City operate the well beginning the day pumping is started and monitor it as required. Accordingly, the City has operated the well and has performed necessary periodic inspections as outlined in a plan approved under Section 9.2.1. of the RAP.

A summary of the 1994 pumpage of the Drift Aquifer gradient control well is presented in Table 7.

Monitoring of the Drift Aquifer gradient control well occurred on a quarterly basis pursuant to the requirements of Sections 3.2. and 9.2.3. of the RAP. A report of the results can be found in an annual report issued pursuant to Section 3.4. of the RAP.

On February 22, 1994 the City submitted a revised Northern Area Drift Aquifer Gradient Control Work Plan to the Agencies. On May 9, 1994 the Agencies approved the work plan, and the City commenced construction of well W439 shortly thereafter. On June 6, 1994 the City notified the Parties of a change in drilling methods from rotary to cable tool, in accordance with Part 0 of the Consent Decree. On August 26, 1994, the City notified the Parties that well W439 was installed, a Contractor has been authorized to begin well house construction, and the City requested a 30 day schedule extension for this project. On September 29, 1994 the Agencies approved the schedule

extension. On December 15, 1994 the City notified the Agencies that all of the well W439 construction was complete and requested inspection on January 12, 1995. The Agencies informed the City that inspection has been conducted on January 3, 1995, and the Remedial Action Plan for the Drift Aquifer Northern Area was approved.

On February 9, 1994 the Agencies approved the request extensions. On February 23, 1994 the City submitted a list of alternatives to be considered in the revised Platteville Aquifer Northern Area Feasibility Study. The revised Platteville Aquifer Northern Area Feasibility Study was submitted on March 14, 1994. A meeting on July 7, 1994 between the City and the Agencies discussed additional modifications to the Feasibility Study. On July 18, 1994 the City submitted an amendment to the Feasibility Study to the Agencies. The amendment was for a new well (W440) to be installed in the Platteville Aquifer Northern Area for gradient control purposes. On October 12, 1994 the Agencies approved the amendment Feasibility Study.

In accordance with Section 9.7.2. of the RAP, the City requested the Agencies to allow an additional gradient control well for the Platteville Aquifer. On August 15, 1995 the City requested the addition of well W434, which is located upgradient of the buried bedrock valley mapped by Hult and Schoenburg in U.S. Geological Survey Water Supply Paper 2211, Plate 2. The Agencies approved the addition of well W434 on September 29, 1994.

Section 10.1.1. of the RAP requires Reilly to submit to the USEPA, MPCA and MDH, within one year of the Effective Date, a plan for investigating certain multi-aquifer wells that may be adversely affecting the Mt. Simon-Hinckley, Ironton-Galesville and Prairie du Chien-Jordan Aquifers. Section 2(a) of the Reilly/City Agreement provides that the City will assume this obligation for Reilly.

On December 30, 1994 the City submitted a revised Investigation Plan for Leaking Deep Multi-Aquifer Wells. On February 9, 1994 the Agencies advised that the submittal appeared to be in compliance with the provisions of the RAP and was approved as submitted. The investigation plan was conducted in 1994 and a report containing the results of this investigation is dated March 15, 1995.

Section 10.2.1. of the RAP requires Reilly to submit a Work Plan for investigating leaking multi-aquifer wells in the St. Peter Aquifer to the USEPA, MPCA, and MDH within 180 days of notice from the Agencies that such a plan is required. Section 2(a) of the Reilly/City Agreement provides that the City will assume this obligation for Reilly. The City submitted the Work Plan on March 27, 1991. In correspondence dated December 16, 1993, the Agencies offered a number of comments on the City's submittal and directed that a revised Work Plan be submitted. On January 11, 1994 the City requested a 20 day extension of the January 12 submittal deadline to February 1, and on February 1, 1994 the City submitted a revised Work Plan for Agency review. On February 9, 1994 the Agencies advised that the revised Work Plan was approved as submitted. The investigation plan was conducted in 1994 and a report containing the results of the investigation is dated March 15, 1995.

Section 11.5.1. of the RAP requires the City to prepare a plan which addresses, among other things, actions to place an adequate soil and vegetative cover as needed to prevent soil erosion on City parks on the Site. In correspondence dated October 12, 1993 the City advised the Parties that it intended to place black dirt in eroded areas of park lands on the Site. This work is ongoing.



## **5.0 SCHEDULED REMEDIAL ACTION PLAN ACTIVITIES**

Table 8 summarizes the expected schedule for RAP activities during 1995. Many of the schedule dates cannot be established definitely because they depend on Agency review, inspection, and approval. Groundwater monitoring is an essential ongoing task.

R95/ANPROG94

**TABLE 1**  
**STATUS OF REMEDIAL ACTION PLAN ACTIVITIES - 1994**

<b><u>RAP SECTION</u></b>	<b><u>ITEM</u></b>	<b><u>ACTIVITIES</u></b>
3.2./3.3.	1994 Annual Sampling Plan	Plan submitted by City on 11/1/93; Agency approval issued 5/9/94
3.2./3.3.	1995 Annual Sampling Plan	Plan submitted by City on 10/12/94; Agency approval pending
3.4.	1993 Annual Monitoring Report	Report submitted by City on 3/15/94
4.2.	GAC System Operation	System off line from 6/17/94 to 6/25/94 and from 10/15/94 to 12/12/94
4.3.	GAC System Monitoring	Samples collected as outlined in the Sampling Plan
5.1.	Mount-Simon Hinckley Monitoring	Completed as outlined in Sampling Plan
6.1.4.	W105 Monitoring	Completed as required by the RAP
7.1.3.	Operation of W23 Source	System off line since 11/30/94 pending repair
7.2.7.	Operation of SLP4	System off line 10/94 to 12/94
7.3.	Prairie du Chien-Jordan Aquifer monitoring	Completed as outlined in Sampling Plan
8.1.3.	St. Peter Aquifer monitoring	Completed as outlined in Sampling Plan
8.3.	Operation of W410	Pumping during 1994 occurred without incident
9.1.3.	Operation/monitoring of Drift-Platteville Aquifer source control wells	Pumping during 1994 occurred without incident; quarterly monitoring completed
9.2.3.	Operation/monitoring of Drift-Platteville Aquifer gradient control well	Pumping during 1994 occurred without incident; quarterly monitoring completed
9.3.3.	Drift-Platteville Aquifer monitoring	Completed as outlined in Sampling Plan

**Table 1 (continued)**  
**Status of Remedial Action Plan Activities - 1994**

<b>9.4.2.</b>	<b>Feasibility Study Report</b>	List of alternatives to be studied submitted by City on 2/23/94; Revised Platteville Aquifer FS submitted 3/14/94; Amendment submitted on 7/18/94. Amendment approved 10/12/94
<b>9.5.1.</b>	<b>Gradient Control Work Plan</b>	City submitted revised plan on 2/22/94; Agencies approved plan on 5/9/94; 12/15/94 construction completed; Agencies' inspection and approval 1/12/95. Well on line 1/23/95
<b>9.6.</b>	<b>Drift-Platteville Aquifer monitoring</b>	Completed as outlined in Sampling Plan
<b>9.7.2.</b>	<b>Additional Platteville Aquifer Gradient Control Well</b>	Well W434, requested by City on 8/15/94 and approved by Agencies on 9/29/94
<b>10.1.1.</b>	<b>Deep Multi-Aquifer Wells</b>	Plan submitted by City on 9/3/87; Agency comment issued 10/16/87; City response submitted 11/5/87; Agency response on 9/3/93; revision submitted by City on 12/30/93; Agency approval on 2/9/94; investigation conducted in 1994
<b>10.2.1.</b>	<b>St. Peter Multi-Aquifer Wells</b>	Plan submitted by City on 3/27/91; Agency response 12/16/93; resubmittal by City on 2/1/94; Agency approval on 2/9/94; investigation conducted in 1994

**TABLE 2**

Section 7.1.3  
W23 1994 Pumpages

	Total Pumpages Gallons	Flow Rate Gallons per Minute
January	2,299,090	51.50
February	2,056,930	51.00
March	2,236,790	50.10
April	2,235,790	51.70
May	2,208,860	49.40
June	2,228,710	51.60
July	2,308,180	51.70
August	2,233,050	50.00
September	2,208,720	51.10
October	2,293,330	51.30
November	2,132,320	49.30
December	-	0.00
TOTAL	24,441,770	50.70

**TABLE 3****SLP4 1994 Pumpages**

	Total Pumpages Gallons	Flow Rate Gallons per Minute
January	44,048,000	987
February	40,872,000	1011
March	54,224,000	1214
April	45,610,000	1056
May	49,996,000	1120
June	43,179,000	1000
July	36,918,000	827
August	42,868,000	992
September	11,756,000	272
October	1,557,000	35
November	0*	0
December	0*	0
TOTAL	371,028,000	851

\* Well shut down due to process equipment failure

**TABLE 4****W410 1994 Pumpages**

	Total Pumpages Gallons	Flow Rate Gallons per Minute
January	3,797,850	85.00
February	3,401,640	84.30
March	3,789,570	84.80
April	3,619,910	83.70
May	3,399,600	78.60
June	3,573,710	82.70
July	3,744,870	83.80
August	3,744,010	83.80
September	3,642,100	84.30
October	3,760,420	84.20
November	3,650,240	84.40
December	3,775,320	84.50
TOTAL	43,899,240	83.50



**TABLE 5****W420 1994 Pumpages**

	Total Pumpages Gallons	Flow Rate Gallons per Minute
January	1,686,050	37.70
February	1,508,620	37.40
March	1,676,500	37.50
April	1,645,270	38.00
May	1,624,120	36.30
June	1,545,460	35.60
July	1,658,560	37.10
August	1,672,260	37.40
September	1,620,070	37.50
October	1,676,720	37.50
November	1,627,160	37.60
December	1,635,370	36.60
TOTAL	19,576,160	37.10

**TABLE 6****W421 1994 Pumpages**

	Total Pumpages Gallons	Flow Rate Gallons per Minute
January	1,370,520	30.70
February	1,229,790	30.50
March	1,320,400	29.50
April	1,316,140	30.40
May	1,315,290	29.40
June	1,331,580	30.70
July	1,323,780	29.60
August	1,362,080	30.50
September	1,319,000	30.50
October	1,363,470	30.50
November	1,343,810	31.10
December	1,347,550	30.10
TOTAL	15,943,410	30.20



**TABLE 7****W422 1994 Pumpages**

	Total Pumpages Gallons	Flow Rate Gallons per Minute
January	2,985,310	66.80
February	2,666,770	66.10
March	2,963,680	66.30
April	2,246,750	52.00
May	3,405,050	76.30
June	2,802,510	69.50
July	2,728,480	61.10
August	2,718,010	60.80
September	2,636,170	61.00
October	2,679,860	60.00
November	2,616,170	60.50
December	2,655,490	59.40
TOTAL	33,104,250	63.30

**TABLE 8**  
**EXPECTED REMEDIAL ACTION PLAN ACTIVITIES - 1995**

<b><u>RAP SECTION</u></b>	<b><u>ITEM</u></b>	<b><u>EXPECTED TIMETABLE</u></b>
3.3.	Sampling Plan for 1995	Agency approval due
3.3.	Sampling Plan for 1996	City to submit plan 10/31/95
3.4.	1994 Annual Report	City to submit report 3/15/95
4.3.	GAC Plant Monitoring	Continued monitoring in accordance with the RAP.
4.3.5.	1994 GAC Annual Report	City to submit report 3/15/95
5.1.	Mount Simon Hinckley Aquifer Monitoring	Refer to Sampling Plan
6.1.4.	W105 Monitoring	Refer to Sampling Plan
7.2.7.	SLP4 Operation	Ongoing
7.3.	Prairie du Chien-Jordan Aquifer Monitoring	Refer to Sampling Plan
8.1.3.	St. Peter Aquifer Monitoring	Refer to Sampling Plan
8.3	St. Peter Aquifer Remedial Action - Gradient Control Well Operation	Ongoing
9.1.3.	Monitoring Drift-Platteville Aquifer Source Control Wells	Refer to Sampling Plan
9.2.3.	Monitoring Drift-Platteville Aquifer Gradient Control Well	Refer to Sampling Plan
9.4.2.	Platteville Aquifer Feasibility Study Report	Agency comment due
9.5.1.	Drift Aquifer Gradient Control Well Operation	Ongoing
9.6.	Drift-Platteville Aquifer Monitoring	Refer to Sampling Plan
9.7.2.	Platteville Aquifer Gradient Control Well (W434)	City to submit Work Plan
10.1.	Multi-Aquifer Well Investigation/Report	Submit report by 3/15/95
10.2.1.	Multi-Aquifer Well Work Plan	City to submit report by 3/15/95